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17 Attorneys for Plaintiff

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19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21
22 RICHARD ZEITLIN, ADVANCED)
23 TELEPHONY CONSULTANTS, MRZ)
24 MANAGEMENT, LLC, DONOR)
25 RELATIONS, LLC, TPFE, INC.,)
26 AMERICAN TECHNOLOGY SERVICES,)
27 COMPLIANCE CONSULTANTS,)
28 CHROME BUILDERS CONSTRUCTION,)
1 INC., and UNIFIED DATA SERVICES,)
2 Plaintiffs,)
3 v.)
4 BANK OF AMERICA, N.A. and JOHN)
5 and JANE DOES 1-100,)
6 Defendants.)
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Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
DEFENDANT'S OBJECTION TO
MAGISTRATE JUDGE'S ORDER [ECF
NO. 192]
(Fifth Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and IB 3-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BOFA"), by and through their respective attorneys of record, hereby jointly stipulate to extend the briefing schedule for the Plaintiffs to file a response to the Defendant's Objection to the Magistrate Judge's Order. (Docs. 192 and 200.) This is the fifth stipulation requesting an extension of time to extend the deadline to

1 respond to the Defendant's Objection. (Doc. 200.) Plaintiffs' response to Defendant's Objection was
2 originally due November 18, 2021. Prior stipulations extended the deadline to December 1, 2021, then
3 to December 6, 2021, then to December 15, 2021, and current due date of December 30, 2021. (Docs.
4 211, 217, 227, and 230.) This request seeks an extension to January 11, 2022. In support thereof, the
5 Plaintiffs and BOFA represent as follows:

6 This stipulation for an extension is not intended to cause undue delay. A longtime family friend
7 of Attorney Robert Bernhoft passed away, and he will be out of the office next week to attend that
8 funeral. Attorney Bernhoft is lead drafter on this response and needs the additional time to adequately
9 respond under the current briefing schedule and personal conflict. For this reason, the Plaintiffs require
10 an extension of time to file their response to BOFA's objections to this Court's Rule 30(b)(6) order.

11 Plaintiffs' counsel contacted BOFA's counsel and discussed extending the briefing deadline.
12 Based on those discussions, the Parties stipulate to extend the deadline for Plaintiffs to respond to
13 BOFA's Objection to the Magistrate Judge's Order to January 11, 2022. The Parties agree that the
14 foregoing constitutes good cause to extend the briefing schedule deadlines.

15 **IT IS SO STIPULATED.**

16 Dated: December 22, 2021
17 THE BERNHOFT LAW FIRM, S.C.

18 Dated: December 22, 2021
19 SNELL & WILMER, L.L.P.

20 /s/ Robert G. Bernhoft
21 Robert G. Bernhoft, Esq.
22 Wisconsin Bar No. 1032777
23 1402 E. Cesar Chavez Street
24 Austin, Texas 78702

25 Attorney for Plaintiffs
26 Appearing *pro hac vice*

27 /s/ Holly E. Cheong
28 Amy F. Sorenson (NV Bar 12495)
Blakeley E. Griffith, Esq. (NV Bar 12386)
Holly E. Cheong (NV Bar 11936)
3883 Howard Hughes Pkwy, Ste. 1100
Las Vegas, Nevada 89169

Attorneys for Bank of America, N.A.

29 **IT IS SO ORDERED:**

30 
31 **RICHARD E. BOULWARE, II**
32 **United States District Court**
33 DATED this 28th day of December, 2021.

1 **Certificate of Service**
2

3 I hereby certify that on December 22, 2021, I electronically filed and served the foregoing
4 third JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT'S
5 OBJECTION TO MAGISTRATE JUDGE'S ORDER [ECF NO. 192] with the Clerk of the Court
6 for the United States District Court for the District of Nevada using the CM/ECF system.

7 */s/ Robert G. Bernhoft* _____
8 Robert G. Bernhoft
9 Attorney for Plaintiffs
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